

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

|                     |   |                       |
|---------------------|---|-----------------------|
| IN RE:              | : | Chapter 13            |
| Vincent Span        | : |                       |
| Natisha Span-Mathis | : | Case No. 23-13846-mdc |
|                     | : |                       |
| Debtors.            | : |                       |

**NOTICE OF APPEARANCE, REQUEST FOR SERVICE OF PAPERS  
AND RESERVATION OF RIGHTS**

PLEASE TAKE NOTICE, that the undersigned hereby appears as counsel for North Mill Equipment Finance LLC (“**Lender**”), an interested party in the above-captioned case and hereby requests, pursuant to U.S. Bankruptcy Court Rules 2002 and 9007, and 11 U.S.C. §§ 342 and 1109(b) of the U.S. Bankruptcy Code, that all copies and pleadings given or filed in this case be given and served upon counsel at the following address and telephone number:

**Lyndsay E. Rowland, Esquire**  
**Starfield & Smith, P.C.**  
**1300 Virginia Drive, Ste. 325**  
**Fort Washington, PA 19034**  
**Telephone No.: (215) 542-7070**  
**Facsimile No.: (215) 542-0723**  
**Email: lrowland@starfieldsmith.com**

PLEASE TAKE FURTHER NOTICE that under 11 U.S.C. § 1109(b) of the U.S. Bankruptcy Code, this request includes not only notices and papers referred to in the Bankruptcy Rules specified above, but also includes, without limitation, orders and notices of any application, motion, petition, pleading, request, complaint or demand, whether formal or informal, whether written or oral and whether transmitted or conveyed by mail, e-mail, hand delivery, telephone, telegraph, facsimile, telex, or otherwise: (1) that affects or seeks to affect in any way any rights or interest of any creditor or any party-in-interest in this case, including Lender with respect to (a) the debtor; (b) property of the estate or proceeds thereof, in which the debtor may claim an interest;

or (c) property or proceeds thereof in the possession, custody or control of others that the debtor may seek to use; or (2) that requires or seeks to require any act, delivery of any property, payment, or conduct by the delivery of any property, payment, or other conduct by Lender.

PLEASE TAKE FURTHER NOTICE that Lender intends that neither this Entry of Appearance nor any later appearance, claim, or other pleadings shall waive (1) Lender's right to have final Orders in non-core matters entered only after *de novo* review by the United States District Court; (2) Lender's right to trial by jury in any proceeding related to this case; (3) Lender's right to have the United States District Court withdraw the reference in any matter subject to mandatory or discretionary withdrawal; or (4) any rights, claims, actions, defenses, set-offs or recruitments to which Lender is or may be entitled to under agreement, in law or at equity, all of which rights, claims, actions, defenses, set-off or recruitments Lender hereby expressly reserves.

**STARFIELD & SMITH, P.C.**

By: s/ Lyndsay E. Rowland, Esquire  
Lyndsay E. Rowland, Esquire  
1300 Virginia Drive, Ste. 325  
Fort Washington, Pa 19034  
(215) 542-7070  
(215) 542-0723 (facsimile)  
*Attorneys for North Mill Equipment  
Finance LLC*